

Plaintiff Yiwu Baimei Electronic Commerce Co., Ltd. (“Plaintiff” or “Baimei”), by and through its undersigned counsel, hereby requests that the Clerk enter default in this matter against the Defendants identified on the Amended Schedule “A” numbered 1-10 (“Defaulting Defendants”) hereto on the ground that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure.

1. On March 8, 2023 Defendants were served with the Summons and a copy of the Complaint by email communication [D.E. 31] as authorized by this Court's Order on Alternate Service [D.E. 23].

2. The time allowed for Defaulting Defendants to respond to the Complaint has expired. Neither Plaintiff nor the Court has granted Defaulting Defendant an extension of time to respond to the Complaint. The Defaulting Defendants have failed to answer or otherwise respond

to the Complaint, and failed to serve a copy of an Answer or other response upon Plaintiff's attorney of record.

3. Plaintiff is informed and believes that the Defaulting Defendants are not considered as infants or incompetent persons. Plaintiff is informed and believes that the Service Members Civil Relief Act does not apply.

WHEREFORE, Plaintiff requests that the Clerk enter default, as authorized by Fed.R.Civ.P. 55(a), against the Individuals, Partnerships, and Unincorporated Associations Identified on Schedule "A" numbered 1-10 and for such other and further relief as the Court deems just and proper.

Respectfully Submitted this 1st of April, 2024,

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